

1 Steven A. Alpert (SBN 159730)

2 **Price Law Group APC**

3 6345 Balboa Blvd. Ste 247

4 Encino, California 91316

(818) 995-4540 Telephone

(818) 995-9277 Facsimile

5 Attorneys for Debtor

6 Lidia Alicia Pedone

7
8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 In re:

11 **LIDIA ALICIA PEDONE,**

12 **Debtor.**

Case No.: 2:17-bk-24650-NB

Chapter 13

13
14 **DECLARATION OF STEVEN ALPERT IN SUPPORT OF MOTION TO COMMENCE**
15 **LOAN MODIFICATION MANAGEMENT PROGRAM**

16
17 I, STEVEN ALPERT, declare:

18 I am the attorney of record in this case and as such I know the following facts to be true from
19 my own personal knowledge, except those facts which are stated on information and belief and as to
20 those facts I believe them to be true. I could and would competently testify under oath to the
21 truthfulness of the following facts:

- 22
- 23 1. I am the attorney record in this Chapter 13 Bankruptcy case, case number 2:17-bk-24650-
24 NB.
 - 25 2. Attached as Exhibit 1 is a true and correct copy of the Certification of Document
26 Preparation.
 - 27 3. This certification was supposed to be attached to the Motion to Commence Loan
28 Modification but was inadvertently not attached to that motion.

1 4. Debtor and her husband Aurelio Pedone are the borrowers on the mortgage.

2
3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and complete to the best of my knowledge. Executed in Encino, California on this
5 18th day of June, 2018.

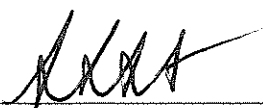
6 
7 _____
8 Steven Alpert
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EXHIBIT 1

Certification of Document Preparation

This *Certification of Document Preparation* shall confirm that the following borrower has successfully completed docUmods:

- **Borrower Name:** Aurelio Pedone
- **Mailing Address:** 9995 Wornom Ave, Sunland, California 91040
- **Property Address:** 9995 Wornom Ave, Sunland, California 91040
- **Bankruptcy Jurisdiction:** California - Central - Los Angeles
- **Bankruptcy Case No.:** 17-24650
- **Mortgage Servicer:** Wells Fargo Home Mortgage / America's Servicing Company
- **Mortgage Loan No.:** ~~608400720~~
- **Invoice No.:** DOCUMODS052320180005

Please be sure to sign and date all forms and gather all supporting documents.

Sincerely,

Default Mitigation Management LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
6345 Balboa Blvd., Suite 247, Encino, CA 91316.

A true and correct copy of the foregoing document entitled **DECLARATION OF STEVEN ALPERT IN SUPPORT OF MOTION TO COMMENCE LOAN MODIFICATION MANAGEMENT PROGRAM** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)** – Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 18, 2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
ATTORNEY FOR DEBTOR: Steven A Alpert enotice@pricelawgroup.com, alpert@pricelawgroup.com
CHAPTER 13 TRUSTEE: Kathy A Dockery (TR) efiling@CH13LA.com
ECF PARTY: Dane W Exnowski dane.exnowski@mcalla.com, bk.ca@mcalla.com
ECF PARTY: Jonetta A Graves jonetta.a.graves@wellsfargo.com
ECF PARTY: Avi Schild bk@atlasacq.com
ECF PARTY: Valerie Smith claims@recoverycorp.com
U.S. TRUSTEE: United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On June 18, 2018, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

JUDGE

Hon. Neil W. Bason
United States Bankruptcy Court
255 E. Temple Street, Suite 1552
Los Angeles, CA 90012

DEBTOR

Lidia Pedone
9995 Wornom Ave.
Sunland, CA 91040

☒ Service information continued on attached page

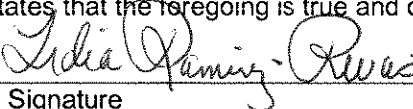
3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 18, 2018
Date

Lidia Ramirez-Rivas
Typed Name


Signature

Label Matrix for local noticing
0973-2
Case 2:17-bk-24650-NB
Central District of California
Los Angeles
Mon Jun 18 12:15:43 PDT 2018

Los Angeles Division
255 East Temple Street,
Los Angeles, CA 90012-3332

American Express
Attn: Bankruptcy Dept.
16 General Warren Blvd.
Malvern, PA 19355-1245

American Express Centurion Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Capital One
PO Box 30285
Salt Lake City, UT 84130-0285

Chase Bank
PO Box 15123
Wilmington, DE 19850-5123

Citibank
PO Box 790034
Saint Louis, MO 63179-0034

Citibank, N.A.
701 East 60th Street North
Sioux Falls, SD 57104-0493

Midland Funding LLC
PO Box 2011
Warren, MI 48090-2011

NBS Default Services
301 East Ocean Avenue, Suite 1720
TS No: 9551-2273
Long Beach, CA 90802-8813

Nordstrom
1700 Seventh Avenue
Suite 300
Seattle, WA 98101-4407

Nordstrom, Inc.
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud Mn 56302-7999

PYOD, LLC its successors and assigns as assi
of B-Line, LLC
Resurgent Capital Services
PO Box 19008
Greenville, SC 29602-9008

Quantum3 Group LLC as agent for
MOMA Funding LLC
PO Box 788
Kirkland, WA 98083-0788

TJ Maxx
TJX Companies, Inc.
770 Cochituate Road
Framingham, MA 01701-4698

United States Trustee (LA)
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017-3560

Wells Fargo Bank
PO Box 10438
Des Moines, IA 50306-0438

Wells Fargo Bank, N.A.
Default Document Processing N9286-01Y
1000 Blue Gentian Road
Eagan, MN 55121-7700

Kathy A Dockery (TR)
801 Figueroa Street, Suite 1850
Los Angeles, CA 90017-5569

Lidia Alicia Pedone
9995 Wornom Ave.
Sunland, CA 91040-1549

Steven A Alpert
6345 Balboa Blvd., Suite 247
Encino, CA 91316-1580

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Courtesy NEF

(u) WELLS FARGO BANK N.A.

End of Label Matrix
Mailable recipients 20
Bypassed recipients 2
Total 22